

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

BIOGEN INTERNATIONAL GMBH and
BIOGEN MA INC.,

Plaintiffs,

V.

MYLAN PHARMACEUTICALS, INC.,

Defendant.

Civil Action No. 17-cv-116-IMK

PLAINTIFFS' DEPOSITION DESIGNATIONS
WITH DEFENDANT'S COUNTER-DESIGNATIONS AND OBJECTIONS

Pursuant to Paragraph 15 of the Scheduling Order (D.I. 56) (“the Scheduling Order”), Plaintiffs’ deposition designations and Defendant’s counter-designations are shown below and were filed on January 9, 2020 (D.I. 306). Also pursuant to Paragraph 15 of the Scheduling Order, any objections to the proposed testimony are shown below. Further, the parties’ joint listing of objection codes is provided below. Biogen and Mylan reserve the right to use at trial any and all deposition designations and counter designations submitted by either party as part of the Pretrial Order.

Plaintiffs' and Defendant's Joint Listing of Objection Codes

A	Authenticity (FRE 901)
Arg	Argumentative
AT	Attorney Objections Not Removed
B	Not Best Evidence Rule Prohibits Introduction (FRE 1002, 1003 and/or 1004)
BS	Beyond the Scope of Direct / Cross / Redirect Examination
30(b)(6)	Beyond the Scope of the Rule 30(b)(6) Deposition Topic
C	Cumulative, Duplicative, Wasteful or Undue Delay (FRE 403)
Char	Improper Character Evidence (FRE 404)
Cmpd	Compound
D	Demonstrative/Should Not Be Admitted Into Evidence
F	Improper Trial Exhibit
H	Hearsay/Improper Use of Deposition (FRE 802 and/or FRCP 32)
R	Irrelevant and/or Immaterial (Relevance) (FRE 401/402)
IAD	Improperly Affirmatively Designating Party Witness Testimony (FRCP 32)
IC	Improper Designation / Counter Designation (FRE 106; FRCP 32(a)(6))
In	Incomplete Testimony (FRE 106; FRCP 32(a)(6))
L	Lack of Personal Knowledge or Competency (FRE 602)
LA	Limited Admissibility (Admissible for Some Purposes but Not Others) (FRE 105)
LC	Legal Conclusion
LD	Leading (FRE 611)
LF	Lack of Foundation (FRE 103, 104 and/or 105)
M	Misleading/Mischaracterizes Prior Testimony (FRE 401-403, 611)
MD	Mischaracterizes Underlying Document (FRE 401-403, 611)
ML	Subject to Motion In Limine
NA	Not prior art
NE	Assumes Facts Not In Evidence
ND	Not disclosed or identified by Plaintiffs in response to one or more of Defendant's discovery requests (including in response to interrogatories propounded under FRCP 33) or as required by FRCP 26; not disclosed or identified in Plaintiffs' contentions.
NR	Nonresponsive
NT	Not Testimony
NX	Not relied on in an expert report
O	Improper Lay or Expert Opinion (FRE 701-703)
OC	Offer to Compromise, Settlement (FRE 408)
P	Unfair, Prejudicial, Confusing and/or Misleading (FRE 403)
I	Reserved Because Exhibit Has Not Been Provided, the Copy Provided Is Illegible and/or the Entry Includes Multiple Documents
S	Calls for Speculation (FRE 602)
U	Untimely/Never Produced (FRCP 26, 37)
V	Vague/Ambiguous/Overbroad (FRE 611)
W	Privileged/Work Product (FRE 501/502)
X	Incomplete Document (FRE 106)
Y	Wrong Document Identified or Incorrectly Described
Z	Contains summaries requiring underlying data

Cara Lansden November 14, 2018					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter-Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter-Designations (to be filed 1/16/20)
From	To		From	To	
16:9	16:15				
23:3	23:5				
23:17	23:25	In			
24:2	24:25	In			
25:2	25:13	In			
25:18	25:25	In			
26:2	26:6	In			
26:9	26:22	In, LF, NE, V, C, S	26:23	27:2	V, P, LF, H, R
33:23	33:25	In			
34:2	34:3	In			
34:6	34:22	In	34:23	35:7	LF, H, In, R, P
			35:13	35:23	
35:24	35:25	In			
36:2	36:25	In, LF, NE, S, V, C	37:19	37:25	V, P, LF, H, R, In, IC
37:2	37:6	In, LF, NE, V, C, S			
37:9	37:18	LF, NE, S	37:19	38:17	V, P, LF, H, R, Cmpd, S
			38:20	40:8	
			59:12	60:3	

			60:6	61:14	
40:9	40:25	In, LF, V, S, C	41:3	41:14	V, P, LF, H, R
			41:23	42:7	
41:2	41:2	In, LF, V, S, C			
44:20	44:25	In, LF, L, V, S, C, LC, O			
45:6	45:7	In, LF, L, V, S, C, LC, O	45:9	45:19	V, P, LF, H, R, O, LC
			45:22	46:12	
			46:14	47:10	
			47:16	48:10	
48:11	48:25	In, LF, L, V, S, C, LC, O, H			
49:2	49:11	In, LF, L, V, S, C, LC, O, H			
49:14	49:25	In, H, LF, L			
50:2	50:8	In, LF, L, NE, V, C, S	45:9	45:19	V, P, LF, H, R, O, LC
			45:22	47:10	
			47:16	48:10	
			57:22	58:14	
50:11	50:25	In, LF, L, NE, V, C, S, O			
51:2	51:9	In, LF, L, NE, V, C, S, O			
51:18	51:25	In, LF, L, NE, V, C, S, O			
52:2	52:25	In, LF, L, O, NE, V, C, S			
53:2	53:25	In, LF, L, O, NE, V, C, S			
54:2	54:13	In, V, S, C	55:6	55:16	V, P, LF, H, R

54:15	54:25	In, V, S, C			
55:2	55:5	In, V, S, C			
55:20	55:25	In, V, S, C			
56:2	56:5	In			
56:8	56:10	In, V, S, C			
56:12	56:22	In, LF, L, V, S, C			
56:25	56:25	In, V, S, C			
57:2	57:3	In, V, S, C			
57:5	57:8	In, V, S, C			
57:12	57:21	LF, H, S, L, LC, V, C	57:22	58:14	LF, H, O, R, P, V
63:15	63:25	In, NE, LF, L			
64:2	64:2	In, NE, LF, L			
65:2	65:10	LF, H, S, L, V, C	62:12	62:15	A, V, P, LF, H, In, R, MD
			62:24	63:14	
			64:3	64:25	
			65:11	65:18	
			65:22	66:5	
			66:8	66:11	
			67:2	67:14	
			67:17	68:8	
			68:11	68:13	
80:22	80:25	In, LF, L, S, O, V, C			
81:2			71:8	71:11	

	81:2	In, LF, L, S, O, V, C	71:23	73:5	S, LF, P, V
			73:7	74:15	
			75:21	76:3	
			76:17	77:3	
			78:14	79:11	
			79:14	80:3	
			80:6	80:18	
			81:3	81:6	
			81:9	81:23	
85:18	85:21	In, LF, L, V, C, S, NE	81:24	82:4	A, V, P, LF, H, In, R
			82:14	83:15	
			84:10	84:16	
			85:7	85:17	
			86:2	87:18	
			87:21	87:22	
			87:24	88:2	
			88:15	88:25	
			97:2	97:17	
98:19	98:22				
99:6	99:14	Y, MD	100:6	100:12	
100:16	100:25	In, H, LF, NE			
101:2	101:3	In, LF, L, H, C, S, V			
101:8	101:25	In, LF, L, H, C, S, V			
102:2	102:6	In, LF, L, H, C, S, V			

102:8	102:12	In, LF, L, C, S, V			
102:14	102:25	In, LF, L, H, C, S, V			
103:2	103:25	In, H, NE, LF, L, C, S, V			
104:2	104:25	In, H, NE, LF, L, C, S, V			
105:2	105:5	In, H, NE, LF, L, S, C, V			
105:9	105:25	In, NE, LF, L, H, S, C, V			
106:2	106:5	In, H, S, NE, LF, L			
106:10	106:16	In, NE, LF, L, H, L, S, C, V	45:9	45:19	LF, H, R, P, O, LC, V, In
			45:22	46:12	
			46:14	47:10	
			47:16	48:10	
			107:21	109:9	
			109:12	110:14	
117:16	117:25	In, NE, L, LF, H, S, C, V			
118:2	118:25	In, NE, L, LF, H, S, C, V			
119:2	119:25	In, H, L, LF, S, C, V			
120:2	120:7	In, L, NE, S, C, V, H			
120:14	120:25	In, H, L, LF, NE, S, C, V			
121:2	121:4	In, H, L, LF	121:21	121:25	V, P, LF, H, In, R
127:17	127:20				
128:2	128:25	In, LF, L, NE, H, S, C, V			
129:2	129:5	In, LF, L, NE, H, S, C, V	130:5	130:13	LF, H, In, R, P
130:14	130:21	H, LF, L, NE, S, C, V	130:22	131:5	LF, H, In, R, P

131:6	131:13	H, LF, L, NE, S, C, V	131:14	131:20	LF, H, In, R, P
			132:3	132:8	
			135:8	135:24	
135:25	131:25	In, H, LF, L, NE, S, C, V			
136:2	136:16	In, H, LF, L, NE, C, S, V			
136:21	136:24	H, LF, L, NE, S, C, V	137:19	138:4	LF, H, In, R, P
			138:10	139:23	
			140:12	141:5	
140:21	140:25	LF, L, In, S, C, V	150:13	150:16	LF, H, R, P
			150:18	153:6	
153:7	153:19	NE, LF, L, O, S, C, V	45:9	45:19	V, P, R, LF, H, O, LC, S, M
			45:22	46:12	
			46:14	47:10	
			47:16	48:10	
			153:20	154:6	
			154:24	155:12	
			155:16	156:2	
178:7	178:9	In, LF, L, H, S, C, V, O, NE	176:15	178:6	LF, H, R, P, In
			178:10	178:23	
188:2	188:6	LF, L, S, C, V	186:14	186:16	V, P, LF, H, In, R, MD
			186:22	187:25	
			188:7	188:10	
			188:13	188:18	

189:5	189:12	H, LF, L, S, C, V	189:13	190:5	V, P, LF, H, R, S
190:6	190:13	In, H, LF, L, S	190:14	190:16	
			190:19	191:19	
191:20	191:25	LF, L, S, H, O, L, S, C, V			
192:2	192:3	In, LF, L, S, H, O, C, V	192:4	192:11	A, V, P, LF, H, R
			193:11	193:20	
194:21	194:25	In, L, S, C, V	194:2	194:20	A, V, P, LF, H, In, R
			199:12	200:18	
195:2	195:15	In, LF, L, S, C, V	195:16	195:20	A, V, P, LF, H, In, R
			195:23	195:24	
			196:2	196:2	
196:4	196:11	LF, L, S, C, V, H	196:12	197:12	A, V, P, LF, H, In, R
197:13	197:14	In, L, S, LF, H, S, C, V			
197:17	197:24	In, LF, L, S, H	197:25	198:23	A, V, P, LF, H, In, R
198:24	198:25	In, LF, L, S, C, V			
199:2	199:4	In, LF, L, S, C, V			
199:7	199:10	In, LF, L, S, C, V	199:12	201:2	A, V, P, LF, H, In, R
201:5	201:7	In, LF, L, S, C, V	201:8	202:17	A, V, P, LF, H, In, R
202:18	202:22	LF, L, S, C, V	203:15	204:6	A, V, P, LF, H, In, R
204:7	204:9	In, H, LF, L, S, C, V			
204:12	204:14	In, LF, L, H, S, C, V	204:25	205:10	LF, S, O

			205:13	205:17	
206:22	206:25	In, C, H, L, S, V, NE			
207:2	207:2	In, C, H, L, S, V, NE			
208:3	208:25	L, C, S, V			
209:2	209:17	In, C, S, L, V			
209:21	209:25	In, NE, H, L, LF, C, S, V			
210:2	210:25	In, NE, H, L, LF, C, S, V			
211:2	211:16	In, NE, H, L, LF, C, S, V			
211:19	211:25	In, NE, H, L, LF, C, S, V			
212:2	212:25	In, NE, H, L, LF, C, S, V			
213:2	213:25	In, NE, H, L, LF, C, S, V			
214:2	214:22	In, NE, H, L, LF, C, S, V			
214:25	214:25	In, NE, H, L, LF, C, S, V			
215:2	215:20	In, NE, H, L, LF, C, S, V	243:20	243:23	A, V, P, LF, H, In, R, S
			244:2	244:19	
			245:5	245:14	
245:15	245:25	In, H, LF, S, C, V	243:20	243:23	A, LF, R, P, V, H, In
			244:2	245:14	
246:4	246:6	In, H, LF, S, C, V			
252:25	252:25	In			
253:2	253:25	In, H	243:20	243:23	A, V, P, LF, H, In, R
			244:2	245:14	

254:2	254:21	In, NE, MD, LF, L, S, C, V			
254:24	254:25	In, NE, MD, LF, L, S, C, V			
255:2	255:10	In, NE, MD, LF, L, S, C, V	240:17	242:19	LF, P, V, R, H, S
			242:22	243:4	
			243:7	243:11	
255:23	255:25	In, NE, MD, LF, L, S, C, V			
256:2	256:25	H, In, NE, MD, LF, L, S, C, V			
257:2	257:2	In			
257:5	257:12	In			
257:17	257:18	In			
257:21	257:25	In			
258:4	258:25	In, MD, L			
259:2	259:5	In			
259:17	259:24	In			
260:3	260:25	LF, L			
261:18	261:25	In, H, S, LF, NE, C, V, L			
262:2	262:25	In, H, LF, NE, S, L, C, V			
263:2	263:14	In, H, LF, NE, S, L, C, V			
263:17	263:23	In, LF, H, S, L, C, V			
264:2	264:17	In, H, L, LF, S, C, V			
264:20	264:25	In, L, H, LF, S, C, V			
265:2	265:25	In, L, H, LF, S, C, V			

266:2	266:4	In, L, H, LF, S, C, V			
266:7	266:23	L, LF, S, C, V, H			
266:25	266:25	In, LF, S, C, V, H			
267:2	267:3	In, S, L, LF, C, V, H	267:5	267:9	V, P, LF, H, R
			269:4	270:18	
			270:21	270:21	

Carmen Bozic December 10, 2018					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter- Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter- Designations (to be filed 1/16/20)
From	To		From	To	
10:22	10:24	IAD	13:23	14:5	
			17:12	18:3	
21:15	21:17	IAD , R, IN	21:21	22:2	
22:3	22:12	IAD, In	22:13	22:14	
22:15	22:25	IAD, R, In			
23:2	23:25	IAD, R, In			
24:2	24:25	IAD, R, In			
25:2	25:25	IAD, R, In			
26:2	26:25	IAD, R, In			
27:2	27:6	IAD, R, In	27:7	27:11	V, P, LF, In, R
28:10	28:16	IAD, In, NE	27:18	27:24	V, P, LF, In, R
			28:7	28:9	
29:2	29:25	IAD, In, C, S, V	28:17	28:25	V, P, LF, In, R
30:2	30:2	IAD, In, C, S, V, R			
30:6	30:18	IAD, In, C, S, V, R			
30:20	30:25	IAD, In, C, V			
31:2	31:15	IAD, In, C, V	31:16	31:17	
31:18	31:22	IAD, In	31:23	31:25	

32:2	32:5	IAD, In, LF, H, S, C, V, L	32:6	32:9	
32:10	32:12	IAD, LF, H, S, C, V			
34:25	34:25	IAD, In, LF, NE, H, S, C, V, L	34:12	34:24	LF, In, R, P, 30(b)(6)
35:2	35:3	IAD, In, LF, NE, H, S, C, V, L			
35:6	35:24	IAD, In, NE, LF, H, S, C, V, L	35:25	36:8	V, P, LF, In, R, 30(b)(6), MD, M
			66:12	66:23	
			66:25	67:9	
			67:13	67:17	
			68:2	68:15	
			68:18	68:18	
36:9	36:21	IAD, S, C, V, L, LF			
37:2	37:11	IAD, In, S, C, V, LF, H	37:12	37:21	V, P, LF, In, R
37:22	37:25	IAD			
38:2	38:2	IAD			
38:9	38:25	IAD, LF, NE, L, S, C, V			
39:2	39:5	IAD, NR, LF, NE, L, S, C, V	39:6	39:9	V, P, LF, In, R
39:10	39:16	IAD, In, LF, L, S, C, V, NE, H	39:6	39:9	V, P, LF, In, R
40:2	40:16	IAD, In, L, S, C, V, LF, H	40:17	40:19	V, P, LF, S, R
40:20	40:25	IAD, In, L, S, C, V, LF, H			
41:2	41:13	IAD, In, L, S, C, V, LF, H	41:14	41:24	V, P, LF, In, R
41:25	41:25	IAD, In, L, S, C, V, LF, H			
42:2	42:21	IAD, In, L, S, C, V, LF, H	42:22	43:9	

43:10	43:22	IAD, In, LF, L, S, C, V, H	42:22	43:9	V, P, LF, In, R
			43:23	44:8	
44:10	44:12				
44:18	44:20	IAD, In, LF, S, C, V	44:16	44:17	R, P, 30(b)(6)
			44:21	45:25	
46:2	46:7	IAD, In, MD, H, L, LF, S, V, C	46:8	46:24	V, P, LF, In, R, 30(b)(6)
46:25	46:25	IAD, In, MD, H, L, LF, S, V, C			
47:2	47:8	IAD, In, MD, H, L, LF, S, V, C	47:9	48:17	V, P, LF, In, R, 30(b)(6)
48:18	48:25	IAD, MD, LF, L, S, V, C			
49:2	49:10	IAD, H, In, O, LF, L, S, C, V	49:13	49:18	
50:10	50:25	IAD, In, LF, L, S, C, V	49:13	49:21	
			49:23	49:23	
			50:2	50:5	
			50:8	50:9	
51:2	51:25	IAD, In, O, LF, L, S, C, V			
52:2	52:12	IAD, In, O, LF, L, S, C, V			
52:16	52:25	IAD, In, O, LF, L, S, C, V	53:2	54:14	
54:15	54:25	IAD, In, LF, O, L, S, C, V			
55:2	55:14	IAD, In, LF, O, L, S, C, V	55:15	56:3	V, P, LF, H, R, 30(b)(6)
56:4	56:19	IAD, LF, In, H, O, L, S, C, V	55:15	56:3	LF, R, P, 30(b)(6), V, H
			56:20	56:25	
58:3	58:14	IAD, LF, In, L, S, C, V	57:6	57:7	V, P, LF, In, R, MD, M

			57:10	58:2	
			58:15	58:23	
			59:19	60:2	
			60:8	60:13	
			63:24	65:17	
			65:19	66:20	
60:20	60:23	IAD, LF, NE, L, S, C, V, O	58:15	58:23	LF, In, R, V, P
			59:19	60:2	
			60:8	60:13	
61:2	61:25	IAD, O, L, S, C, V, LF			
62:12	62:20	IAD, L, S, C, V, LF			
62:24	62:25	IAD, O, L, S, C, V, LF			
63:2	63:14	IAD, O, L, S, C, V, LF			
63:17	63:23	IAD, O, L, S, C, V, LF			
69:13	69:21	IAD, In, LF, NR, L, C, V, LF	68:19	69:5	
69:24	69:25	IAD, H, In, LF, L, S, C			
70:2	70:25	IAD, H, In, LF, L, S, C, V			
71:2	71:16	IAD, H, In, LF, L, S, C, V	71:17	71:25	A, V, P, LF, In, R, C
			72:3	72:3	
			72:5	72:5	
			72:9	72:24	
			73:2	73:21	
			73:23	74:3	

74:4	74:6				
74:14	74:21	IAD, In, LF, L	74:12	74:13	
77:6	77:10	IAD, In, LF, L, S, C	74:22	75:9	A, V, P, LF, In, R
			75:11	75:20	
			76:18	77:5	
145:22	145:25	LF, IAD, IC, In, L, S, C, LF, H,	140:22	140:25	V, P, LF, In, R
			141:9	144:5	
146:2	146:25	LF, IAD, IC, In, L, S, C, H			
147:2	147:6	LF, IAD, IC, In, L, S, C, H			
148:2	148:25	IAD, LF, H, L, S, C	147:16	147:25	
149:2	149:25	IAD, H, L, S, C, LF			
150:2	150:16	IAD, In, O, L, H, LF, S, C			
150:19	150:25	IAD, In, O, L, H, LF, S, C			
151:2	151:3	IAD, In, O, L, H, LF, S, C			
151:6	151:19	IAD, In, O, L, H, LF, S, C			
152:3	152:6	IAD, In, L, H, LF, S, C	151:20	152:2	V, P, LF, In, R, M, MD
152:9	152:21	IAD, In, LF, O, L, H, S, C	151:20	152:2	V, P, LF, In, R
			152:22	152:24	
153:20	153:25	IAD, H, In, L, LF, S, C, O			
154:2	154:17	IAD, H, In, L, LF, S, C, O	154:18	155:7	V, P, LF, In, R
			155:14	155:14	

156:7	156:17	IAD, H, MD, In, L, LF, S, C, O	156:18	157:21	V, P, LF, In, R
			157:23	157:25	
			167:24	168:6	
163:19	163:25	IAD, MD, In, LF, L, NE, S, H, C			
164:2	164:14	IAD, MD, In, LF, L, NE, S, H, C	158:4	158:17	V, P, LF, In, R
			159:9	161:3	
			161:6	162:7	
			162:11	163:18	
			164:21	165:4	
			165:6	165:22	
165:23	165:25	IAD, O, In, LF, NE, H, C, L, S			
166:2	166:25	IAD, O, In, LF, NE, H, C, L, S			
167:2	167:16	IAD, O, In, LF, NE, H, C, L, S	165:16	165:22	V, P, LF, In, R
			167:17	167:22	
168:13	168:16	IAD, In	169:15	169:23	
			169:25	170:8	
170:9	170:14	IAD			
173:9	173:25	IAD, In, LF, NE, H, O, L, S, C	172:14	173:8	In, R, P
174:2	174:25	IAD, In, LF, NE, H, O, L, S, C	175:2	176:2	In, R, P
			176:5	177:15	
178:15	178:21	IAD, L, In, NE, C, V	177:16	177:18	In, R, P, LF

			177:25	178:14	
			178:22	180:3	
182:3	182:13	IAD, In, LF, NE, L, S, C, V	180:6	180:8	
			180:12	181:6	
			181:13	182:2	
183:4	183:12	IAD, LF, NE, In, L, S, C, V	182:14	183:3	V, P, LF, S, In, R
183:14	183:19	IAD, S, LF, NE, In, H, L, S, C, V	183:20	183:21	V, P, LF, In, R, 30(b)(6)
			184:3	184:17	
			184:19	184:21	
			186:9	186:15	
191:21	191:25	IAD, LF, NE, In, H, L, S, C, V	186:16	187:11	V, P, LF, R, In, C
			187:19	187:23	
			188:19	188:24	
			189:14	189:24	
			190:3	190:15	
			190:18	191:20	
192:2	192:16	IAD, LF, NE, In, S, MD, H, LS, C, V	193:3	193:6	V, P, LF, In, R, C
			193:8	193:17	
			193:24	194:17	
			194:21	195:4	
			195:6	195:18	

			195:21	196:17	
			197:4	198:2	
200:18	200:25	IAD, LF, NE, In, S, O, L, C, V	198:3	198:10	V, P, LF, In, R, 30(b)(6)
			198:12	198:18	
			198:20	198:25	
201:2	201:20	IAD, LF, NE, In, S, O, L, C, V	201:21	202:15	V, P, LF, In, R, MD, M, S
			202:18	202:25	
207:8	207:16	IAD, LF, NE, In, S, L, C, V	203:11	203:13	V, P, LF, In, R, MD, M, S
			203:20	204:12	
			205:3	205:10	
			205:19	205:21	
			206:3	206:21	
			206:24	207:7	
210:11	210:20	IAS, LF, NE, In, L, S, C, V	207:18	207:20	
			207:25	208:25	
			210:3	210:10	
210:22	210:25	IAD, LF, NE, In, L, O, S, C, V			
211:2	211:18	IAD, LF, NE, In, L, O, S, C, V	211:19	211:22	
			211:24	212:3	
212:4	212:8	IAD, MD, In, NE, LF, L, S, C	212:9	213:15	C, S, V, P, LF, R

			213:17	214:16	
			214:18	215:9	
			215:16	215:20	
			216:5	216:9	
219:16	219:25	IAD, In, LF, NE, L, S, C, V	216:14	216:16	
			216:21	217:12	
			218:11	218:22	
220:2	220:10	IAD, In, LF, NE, L, S, C, V			
220:14	220:20	IAD, H, MD, LF, NE, In, L, S, C, V	220:21	220:25	V, P, LF, S, R
221:12	221:24	IAD, H, In, LF, NE, L, S, C, V	221:2	221:11	
			221:25	222:25	
223:2	223:25	IAD, In, LF, NE, MD, L, S, C, V	224:5	225:16	
			225:18	225:19	
224:2	224:3	IAD, In, LF, NE, MD, L, S, C, V	224:5	225:16	S, V, P, LF, In, MD
			225:18	225:19	
227:22	227:25	IAD, In, LF, NE, H, L, S, C, V	226:15	226:17	
			226:22	227:21	
228:2	228:15	IAD, In, LF, NE, H, L, S, C, V			
235:6	235:25	IAD, In, LF, NE, H, L, S, C	231:12	231:14	
			231:19	232:15	
			233:17	234:23	
236:2	236:4	IAD, In, LF, NE, H, L, S, C	236:5	237:11	

239:4	239:15	IAD, In, LF, NE, NR, L S, C, V			
239:17	239:25	IAD, In, LF, NE, NR, L, S, C, V			
240:2	240:3	IAD, In, LF, NE, NR, L, S, C, V	240:4	240:7	V, P, LF, M, MD, R, In
			240:9	240:12	
240:13	240:23	IAD, NE, LF, In, R, L, S, C, V	240:24	241:2	V, P, LF, 30(b)(6)
			241:4	241:7	
			241:10	241:12	
			241:14	241:24	
242:18	242:25	IAD, In, LF, NE, O, V, L, S	241:25	242:17	V, P, LF, In, R, 30(b)(6)
243:2	243:2	IAD, In, LF, NE, O, V, L, S	243:3	243:13	V, P, LF, In, R, 30(b)(6)
			244:23	246:12	

Matvey Lukashev January 24, 2019					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter-Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter-Designations (to be filed 1/16/20)
From	To		From	To	
9:10	9:12	IAD			
22:2	22:8	IAD	17:16	17:22	
26:12	26:25	IAD, In	27:8	27:15	
27:2	27:2	IAD, In	28:2	28:11	LF
27:16	27:25	IAD, In	28:12	28:14	LF
			28:17	28:20	
28:21	28:25	IAD, In			
29:2	29:2	IAD, In	29:3	29:25	LF, V, P
			31:11	31:13	
			31:16	32:9	
33:2	33:6	IAD, In, LF, NE, S, C, V	32:10	32:12	V, P, M
			32:15	32:25	
33:9	33:19	IAD, LF, In, S, C, V	34:23	35:3	
35:18	35:24	IAD, In	35:8	35:17	
37:9	37:20	IAD, In	37:21	38:3	
38:8	38:10	IAD, LF, L, S, C, V, NE, LC			
38:12	38:25	IAD, LF, L, S, C, V, NE, LC			
39:2	39:2	IAD, LF, L, S, C, V, NE, LC	39:3	39:7	

55:13	55:20	IAD, In, S, C, V	47:8	47:15	V, P, LF, M
			52:13	53:15	
			54:8	54:13	
			54:16	55:12	
66:3	66:25	IAD, H, S, C, V			
67:2	67:5	IAD, In, H, S, C, V	67:6	67:12	
67:13	67:17	IAD, S, V, C			
68:4	68:16	IAD, S, V, C, L, LF			
106:9	106:12	IAD, In, LF, L, S, C	92:3	92:7	V, P, In, LC
			92:12	92:14	
			103:7	103:9	
			104:16	105:3	
			105:5	106:8	
134:11	134:16	IAD, In, LF, NE, L, S, C, V	107:16	108:24	V, P, S
			109:2	109:4	
			134:2	134:10	
			134:17	135:4	
			135:6	135:6	
			135:8	135:10	
136:9	136:14	IAD, In, LF, NE, L, S, C, V, LC	136:5	136:6	V, P, S, C
			136:8	136:8	
			136:15	136:17	

			136:20	136:21	
147:22	147:25	IAD, In, LF, NE, L, S, O, LC	143:4	143:6	V, P, LF, In, O, R, S
			143:8	143:20	
			143:22	143:22	
			147:2	147:12	
			147:15	147:21	
148:3	148:5	IAD, In, LF, NE, L, S, O, LC	148:6	148:7	V, P, LC, In, O
			148:10	148:15	
157:23	157:25	IAD, In, LF, NE, L, S, LC, C	155:9	155:21	V, P, LF, O, LC, S
			156:3	156:20	
			157:12	157:14	
			157:16	157:22	
158:3	158:8	IAD, In, LF, NE, L, S, LC, C	158:9	158:11	V, P, LF, O, M, MD, LC, S
			158:14	158:18	
			158:20	159:4	
			159:6	159:12	
175:3	175:15	IAD, In, LF, NE, L, S, LC, O, C	170:9	170:16	
			170:23	171:12	
			174:14	174:15	
			174:18	175:2	
182:20	182:25	IAD, In, LF, NE, L, S, C, V	178:9	178:10	
			181:10	182:19	
183:2	183:13	IAD, In, LF, NE, L, S, C, V			

184:6	184:9	IAD, In, LF, NE, L, S, C, LC	184:10	185:18	LF, LC, S
			185:21	187:7	

Tracey Dawson January 30, 2019					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter- Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter- Designations (to be filed 1/16/20)
From	To		From	To	
9:2	9:9	IAD	8:23	8:25	
54:3	54:8	IAD, In, LF, L, S, C, P, V	51:10	51:12	
			51:15	51:18	
			52:4	52:7	
			52:15	53:2	
			53:6	53:7	
			102:13	103:2	
139:10	141:9	IAD, In, LF, L, S, C, P, V, R, O	138:18	138:23	V, P, R, S, LF, Arg
			141:10	141:11	
			141:15	141:25	
			142:5	143:13	
			143:18	143:23	
			144:4	144:4	
144:5	144:6	IAD, In, LF, L, S, C, P, V, R, O			
144:12	146:6	IAD, In, LF, L, S, C, P, V, R, O	147:10	147:12	
			147:16	147:17	

148:4	148:18	IAD, In, LF, L, S, C, P, V, R, O			
148:23	149:24	IAD, In, LF, L, S, C, P, V, R, O	149:25	150:8	LF, H, R, P, 30(b)(6), S
			150:13	150:17	
			152:23	152:24	
			153:6	154:14	
			154:21	155:7	
			155:12	155:23	
155:24	156:2	IAD, In, LF, L, S, C, P, V, R, O	156:5	156:5	V, P, LF, O, S, 30(b)(6)
156:11	157:2	IAD, In, LF, L, S, C, P, V, R, O			
158:4	158:20	IAD, In, LF, L, S, C, P, V, R, O	158:21	158:24	C, V, P, R
			159:6	159:9	

Victoria Brown (Deposition I) December 14, 2018					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter- Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter- Designations (to be filed 1/16/20)
From	To		From	To	
9:12	9:25	none	10:2	10:21	
75:17	76:11	X, LF, In, C, V, L	73:23	74:3	
			73:16	73:19	
			76:12	76:14	
77:11	77:21	In, LF, C, V, L	77:22	77:23	V, P
			78:3	78:12	
82:16	83:23	In, LF, H, L, O, S, V	79:5	79:11	
			81:10	81:14	
			81:24	82:15	
			83:24	84:3	
92:25	93:11	H, L, R, LF, S, V, O	93:12	93:23	
128:5	128:25	In, L, LF, O, S, V	127:24	128:4	
			129:2	129:5	
			129:7	131:4	
155:21	156:24	In, L, LF, S, V, O	145:7	145:18	LF, In, R
			154:15	154:17	
			154:19	154:19	
			156:25	157:6	

180:9	180:12	L, In, LF, S, C, V	180:13	180:16	
180:17	181:3	L, In, LF, S, C, V	181:4	181:8	
206:18	206:22	L, LF, S, C	207:19	208:4	
207:3	207:11	In, L, LF, S, C	207:19	208:4	
207:13	207:15	In, L, LF, S, C	207:17	207:17	
			207:19	208:4	
207:19	207:24	In, L, LF, S, C	207:25	208:4	
210:25	211:9	In, L, R, LF, S, C			
211:11	211:12	In, L, R, LF, S, C			
211:16	211:19	In, L, R, LF, S, C			
211:21	211:22	In, L, R, LF, S, C	211:24	212:10	V, P, LF, 30(b)(6)
213:4	213:9	In, L, R, LF, S, C	213:10	213:20	
214:2	214:3	In, L, R, LF, S, C	214:4	214:5	
214:6	214:8	In, L, R, LF, S, C	214:9	214:13	
214:22	214:25	In, L, R, LF, S, C	215:2	215:22	

Victoria Brown (Deposition II) February 8, 2019					
Plaintiffs' Designations (to be filed 1/9/20)		Defendant's Objections to Designations (to be filed 1/16/20)	Defendant's Counter- Designations (to be filed 1/9/20)		Plaintiffs' Objections to Counter- Designations (to be filed 1/16/20)
From	To		From	To	
244:6	244:23	In, C, R	241:13	241:23	
			245:3	245:8	
248:16	249:14	In, L, LF, C, R	249:15	249:20	
249:21	252:15	L, LF, X, C, R	253:6	255:9	
288:8	288:17	In, L, LF, S, C, R	288:18	289:9	
298:7	298:21	In, L, LF, X, C, R, S	296:11	296:17	
			296:22	296:23	
			297:10	298:6	
			298:22	299:14	
315:14	316:23	In, R, L, LF, S, C	314:4	314:23	
			315:6	315:13	
317:11	317:19	In, V, L, S, C			
320:4	320:16	In, L, LF, S, C	316:24	317:10	C
			320:2	320:3	
			320:17	321:2	
322:7	322:14	In; LF, L, S, C	322:2	322:6	

341:22	342:9	In, L, LF, R, S, C	342:10	342:21	V, P, LF, H, 30(b)(6)
351:19	352:4	R, L, LF, S, C, In			
406:18	407:4	In, L, NE, C	407:5	407:22	
			408:17	408:21	

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Respectfully Submitted,

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